

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

BENJAMIN F. Miles IV

(Enter above the full name of the plaintiff
or plaintiffs in this action.)

vs.

Judge LEE COFFEY, A.D.A.G. MEGHAN FOWLER,
CORRECTIONAL OFFICER (C/O) BURNS, PREE, ROGERS,
WHITE, JAMES AND SARGENT CLEAVES OF THE SHELBY COUNTY CRIMINAL JUSTICE CENTER
(Enter above the full name of the defendant
or defendants in this action.)

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS UNDER 42 U.S.C., §1983

I. Previous Lawsuits

A. Have you begun other lawsuits in state or federal court dealing with the same facts involved in this action or otherwise relating to your imprisonment? Yes ☒ No ☐

B. If your answer to A is yes, describe each lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline.)

1. Parties to this previous lawsuit

Plaintiffs: Benjamin Miles

Defendants: Lt. A. Cannolly, C/O Kimberly White, of TAMARA BARKER

2. Court (if federal court, name the district; if state court, name the county):

U.S. STATES DISTRICT COURT WESTERN DISTRICT OF TENNESSEE W.D.

3. Docket Number: 19-2241-JDT-cgc

4. Name of judge to whom case was assigned: JAMES D. Todd

5. Disposition (for example: Was the case dismissed? Was it appealed? Is it still pending?)

Still Pending

6. Approximate date of filing lawsuit: April 17, 2019

7. Approximate date of disposition: e

II. Place of Present Confinement: Shelby County Criminal Justice Center

A. Is there a prisoner grievance procedure in the institution?

Yes ☒ No ☐

B. Did you present the facts relating to your complaint in the state prisoner grievance procedure?

Yes ☒ No ☐

C. If your answer is Yes:

1. What steps did you take? Gled grievances pertaining Abuse And Misuse of Detention Process. Grievance # 6-479615 & 485519
2. What was the result? # 479615 was Grievable 485518 was Ruled Not

D. If your answer is No, explain why not: _____

III. Parties

(In item A below, place your name in the first blank and place your present address in the second blank. Do the same for additional plaintiffs, if any.)

A. Name of Plaintiff Benjamin F. Miles IV

Address 201 Poplar Ave Memphis, TN 38103

(In item B below, place the full name of the defendant in the first blank, his official position in the second blank, and his and his place of employment in the third blank. Use Item C for the names, positions, and places of employment of an additional defendants.)

B. Defendant Lee COFFEE is employed as

Judge
at SHELBY COUNTY 30th Judicial District in TENNESSEE

C. Additional Defendants: Meghan Fowler (A.D.A.G. of Shelby County 30th Judicial District in TENNESSEE) BURNS, PREE, ROGERS, WHITE, JONES (CORRECTIONAL OFFICERS OF Shelby County Criminal Justice Center)

IV. Statement of Claim

State here as briefly as possible the facts of your case. Describe how each defendant is involved. Include also the names of other persons involved, dates, and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Use as much space as you need. Attach extra sheet if necessary.

STATEMENT of Claim is Accompanied with
this FORM on other PAPER

V. Relief

State briefly exactly what you want the court to do for you. Make no legal arguments.

Cite no cases or statutes.

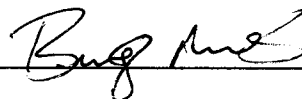
Relief IS Accompanied this
Form ON ANOTHER PAPER

VI. Jury Demand

I would like to have my case tried by a jury. Yes () No (X).

I (We) hereby certify under penalty of perjury that the above complaint is true to the best of our information, knowledge, and belief.

Signed this 5th day of November, 20 19.



(Signature of Plaintiff/Plaintiffs)

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE (MEMPHIS)
WESTERN DIVISION

BENJAMIN F. MILES IV (PETITIONER)

V.

Judge LEE COFFEE, A.D.A.G. MEGHAN FOWLER, CORRECTIONAL OFFICER (C/O) J. BURNS,
C/O. PREE, C/O, ROGERS, C/O. WHITE, C/O JONES, C/O Sgt. CLEMENS OF
The SHELBY COUNTY Criminal Justice Center (Defendants)

PRO SE Complaint For Civil Rights Violation 42 U.S.C. §1983

COMES NOW BENJAMIN F. Miles IV (Petitioner)
THROUGH PRO SE LITIGANT IN PURSUANT TO
42 U.S.C. §1983, U.S.C. Const. Amend. 6, 8, 14
WOULD MOVE THIS HONORABLE COURT TO JUDGE
AND DETERMINE THIS COMPLAINT OF PETITIONER
IN THE OUTCOME OF THE MONETARY SUMS
MENTIONED IN THE FOLLOWING AND ANY OTHER
REMEDY OR RELIEF THE PETITIONER OF THIS
COMPLAINT IS ENTITLED TO, UNDER THE
TORT-CLAIMS Act.

Mr. Benjamin Miles (Plaintiff) Alleges THAT HE IS THE VICTIM TORT FROM THE TORTIOUS ACTIONS OF Assistant District Attorney MEGHAN Fowler AND Judge LEE V. COFFEE OF THE 30th Judicial District OF TENNESSEE DIVISION 7 OF SHELBY County AT MEMPHIS. THESE ACTIONS INCLUDES:

Malicious Prosecution, Violation of Due Process, Abuse of Process, Fraud, Abuse of Discretion, OFFICIAL MISCONDUCT, RULE 11 OF TENNESSEE SUPREME COURT VIOLATION, VIOLATION OF ART. 1 § 17 OF THE TENNESSEE CONSTITUTION, SELECTIVE PROSECUTION VIOLATION.

1. MR. Miles Alleges THAT MEGHAN Fowler ENGAGED MISCONDUCT BY DENING MR. Miles DUE PROCESS GRANTED TO HIM BY THE UNITED STATES & TENNESSEE CONSTITUTION. MR. Miles Alleges Ms. Fowler DONE THIS BY ALTERING OFFICIAL DOCUMENTS UNDER THE COLOR OF OFFICE VIOLATING T.C.A. 39-16-402 et seq. MR. Miles Alleges False Pretenses OF Ms. Fowler FOR THE ACT OF FALSIFYING RECORDS OF THE DEFENDANT WITH THE INTENT TO DECEIVE, OR INJURE, OR TO CONCEAL WRONG DOINGS, VIOLATING 18 U.S.C.A. § 1506, 2071, 2073, AND Model Penal CODE § 224.4

This denied MR. Miles the opportunity to BE HEARD AT A MEANINGFUL TIME and in a MEANINGFUL MANNER.

2. DEFENDANT MS. FOWLER ALLEGEDLY USED ABUSIVE TACTICS OF VEXXING, HARRASSING, DRIVING UP MR. MILES COURT COST AND DELAYING THE PROCEEDINGS RATHER THAN CONCLUDE A MATTER BY AGREEMENT OR ADJUDICATION BY MS. FOWLER TO HYPERBOLE CHARGES AGAINST THE [REDACTED] PLAINTIFF. MR. Miles ALLEGES THAT THE MALICIOUS, ARBITRARY NEGATIVE ACTS THAT MS. FOWLER HAS DISPLAYED TOWARDS MR. Miles, INCLUDES BOOTSTRAPING BY USING A SINGLE CHARGE TWICE OR MORE TO SUPPORT AN ADDITIONAL CHARGE TO OVERCHARGE THE DEFENDANT, BY ANTEDATING CHARGES TO COMPEL THE STATES ABUSE OF DISCRETION BY SETTING DATES FOR TRIALS THAT NEVER COMMENCE OR CONTINUE, TO BE REPLACED WITH ANOTHER TRIAL DATE OF A ENTIERLY DIFFERENT CHARGE WITOUT COMPLETING THE PRIOR TRIAL LEADING TO EXTRODINARY DELAYS OF MR. Miles DUE PROCESS.

FACTS & LAW

1. MR. MILES HAS BEEN SET FOR TRIAL TWICE SINCE HIS INCARCERATION FOR TWO DIFFERENT CHARGES ONE ON THE DATE OF 7-29-2019 FOR THE CASE OF C1708584 AND 10-7-2019 FOR THE CASE OF C1709060, NEITHER TRIAL HAS TAKEN PLACE NOR HAVE THEY BEEN SET FOR ANOTHER TRIAL DATE. NOW DEFENDANT IS SET FOR ANOTHER TRIAL FOR THE DATE OF 04-20-2020 FOR THE CASE OF C1708867.
2. MR. MILES HAS BEEN INCARCERATED SINCE THE DATE OF 3-31-2017.
3. THE CHARGES AND CASES ① 17007189 (DOMESTIC ASSAULT) FROM THE DATE OF 3-31-2017, ② 17011574 (DOMESTIC ASSAULT) FROM THE DATE OF 3-31-2017, ③ 17011037 (DOMESTIC ASSAULT, AGG KIDNAPPING) FROM THE DATE OF 5-19-17, ④ 17007189 (DOMESTIC ASS) FROM THE DATE OF 5-24-2017, ALL ARE FROM A ONE SINGLE INCIDENT INVOLVING THE SAME ONE ALLEGED VICTIM FROM THE DATE OF 3-31-2017 EVIDENCE # 1703016328 FOR THEM ALL.
4. THAT ONLY ONE CHARGE WAS HELD TO STATE ON THE DATE OF 5-19-2017 IN MR. MILES PRELIMINARY HEARING AND THAT IS THE CHARGE OF 17007189 (DOMESTIC VIOLENCE) 3-31-17. AND THE H.T.S # IS H1702734,

But there ARE IN FACT TWO H.T.S #'s FROM THE DEFENDANTS PRELIMINARY HEARING OF 5-19-2017 WHICH ARE H1702734 AND H1702735

5. THERE ARE NUMORUS DOCUMENTS IN DEFENDANT'S DISCOVERY THAT SHOWS THE PRACTICE OF "ANTE DATING" CHARGES. FOR INSTANCE

(1) THE CHARGE OF 3-31-2017 HAS BEEN REFERENCED AS;
(a) CASE # CC18-2058, COURT # 17-05386 CHARGE DATE: 3-29-2017

(b) CASE # 17011574 CHARGE DATE: 3-31-2017
(c) CASE # 17011037 CHARGE DATE: 5-19-2017
(d) CASE # 17007189 CHARGE DATE 5-24-2017
(e) CASE # 17007189 CHARGE DATE 3-31-2017

(2) THE CHARGE OF 3-17-2019 HAS BEEN REFERENCED AS;

(a) CASE # C1709867 CHARGE DATE 3-14-2017

6. INDICTMENT(S) NO: 17-05355 HAS FOUR DIFFERENT COUNTS

- (I) CRIMINAL ATTEMPT: MURDER SECOND DEGREE
- (II) AGGRAVATED ASSAULT
- (III) AGGRAVATED ASSAULT
- (IV) DOMESTIC ASSAULT

THESE COUNTS/INCIDENTS ALL ARISE FROM ONE INCIDENT AND ONE ALLEGED VICTIM. IN THIS THE PRACTICE OF "DUPPLICITY" IS PRACTICED, ALSO "MULTIPLICITY"

(b) INDICTMENT NO. 17-05542 HAS TWO COUNTS

(1) AGGRAVATED ASSAULT

(1) DOMESTIC ASSAULT

THESE COUNTS ARISE FROM THE SAME TRANSACTION AND AN INCIDENT AND FOR THE SAME ALLEGED VICTIM. IN THIS "DUPLICITY" IS PRACTICED

(b) INCIDENTS ARISING FROM THE SAME TRANSACTIONS OR CRIMINAL EPISODE, CONDUCT, AND ALLEGED VICTIM(S) THAT WERE AWARE TO THE PROSECUTOR (MS. FOWLER)

AT THE TIME OF INDICTMENT(S) HAS BEEN SET FOR SEPARATE TRIALS FOR EACH OFFENCE, THIS IS THE PRACTICE OF "SAVING BACK."

THERE ARE RULES TO PROHIBIT THE PROSECUTING AUTHORITY FROM SUBJECTING THE DEFENDANT TO SEPARATE TRIALS FOR MULTIPLE OFFENSES.

DEFENDANT WOULD SHOW THAT THIS WAS

DELIBERATELY DONE NOT PRESENTING CHARGES TO THE GRAND JURY. THE DEFENDANT WOULD SHOW THAT HIS TRIALS WAS POSTPONED SO THAT SUBSEQUENT INDICTMENTS COULD BE

RETURNED BY THE GRAND JURY TO DELAY

DEFENDANT'S FREEDOM AND DUE PROCESS. IF NOT THE ADDITIONAL CHARGES WOULD HAVE BEEN

BARRED FROM FUTURE PROSECUTION FOLLOWING DISPOSITION OF THE INITIAL CHARGES. TENN. R. CRIM. P. (8)

8. THE UNITED STATES CONSTITUTION 5th

-AMENDMENT PROVIDES (NO PERSON shall be subject FOR THE SAME OFFENCE TO BE TWICE PUT IN JEOPARDY OF LIFE, LIMB, NOR shall be Compelled in ANY CRIMINAL CASE to be a witness Against Himself, NOR be DEPRIVED OF LIFE, LIBERTY OR PROPERTY, WITHOUT due PROCESS OF LAW). AS WELL AS THE 4th Amendment Provide (The Right OF The people to be SECURE in their PERSONS, HOUSES, PAPERS, AND EFFECTS, Against UNREASONABLE SEARCHES AND SEIZURES, shall ~~NOT~~, ~~be~~ violated, AND NO WARRANTS shall issue, but UPON PROBABLE CAUSE, supported by OATH OR Affirmation AND Particularly describing the place to be searched AND the PERSONS OR things to be seized) The 14th Amendment provides In part

NO STATE shall make OR ENFORCE ANY LAW which shall ABRIDGE the privileges OR IMMUNITIES OF Citizens OF the United States NOR shall ANY STATE DEPRIVE ANY PERSON OF LIFE, LIBERTY, OR PROPERTY without due PROCESS OF LAW; NOR deny to ANY PERSON within its Jurisdiction the equal protection of the laws. TENNESSEE Constitution Provides similar provisions Art. 1, § 9. Provides in ALL CRIMINAL Prosecutions, The Accused hath the Right to be heard and himself and his counsel.

MR. MILES ALLEGES THE PROBABLE CAUSE(S) TO AFFIDAVETS AND/OR INDICTMENTS DO NOT CONTAIN ANY NEXUS TO CONCLUDE THAT THE DEFENDANT COMMITTED ANY CRIME.

BC) MR. MILES ALLEGES JUDGE LEE M. COFFEE HAS DELAYED MR. MILES CONSTITUTIONAL JUDICIAL PROCEDURES, CAUSING A UNCONSTITUTIONAL PRE-TRIAL INCARCERATION. MR. MILES PROVIDES HE HAS BEEN ASSIGNED TO JUDGE COFFEE COURT ROOM DIVISION 7 OF MEMPHIS 30TH JUDICIAL DISTRICT. MR. MILES ALLEGES HE HAS ORALLY REQUEST JUDGE COFFEE IN OPEN COURT TO INVOKE HIS SPEEDY TRIAL RIGHTS. TENN. SUPREME COURT RULES 11 (III) (C) PROVIDES THAT, NO CASE MAY BE HELD UNDER ADVISEMENT IN EXCESS OF SIXTY DAYS, AND NO MOTIONS, OR OTHER DECISION OF THE TRIAL JUDGE THAT DELAYS THE DATE OF TRIAL OR FINAL DISPOSITION IN THE TRIAL COURT, SHALL BE HELD UNDER ADVISEMENT FOR MORE THEN THIRTY DAY ABSENT THE MOST COMPELLING OF REASONS.

Mr. Miles Alleges THAT HE HAS BEEN SET FOR TRIAL two times on different occasions, once ON THE DATE OF July, 29th 2019, But TRIAL DID NOT COMMENCE DUE TO Absent of THE Judge, AND THAT A WEEK BEFORE TRIAL THAT MR Miles WAS SET FOR A Report DATE ON July 22, 2019 and July 23, 2019 in which Both dates Judge COFFEE WAS ABSENT AND THE COURT was closed NOT OPEN. Also plaintiff WAS SET FOR TRIAL October 7, 2019 which The Judge WAS Absent Also. Mr Miles was SET Oct. 8th and 9th 2019 which Judge COFFEE WAS ALSO ABSENT AND Court was closed.

Mr. Miles Alleges THAT Judge COFFEE STATED TO HIM "Mr. Miles My docket Is packed with over 99 inmates who HAS BEEN INCARCERATED 3 years or more who HAS NOT commenced TO TRIAL, Mr. Miles I do NOT HAVE Time TO Here your CASE, IF It TAKES ANOTHER 6 Months Mr. Miles You will HAVE you DAY IN Court" By Judge COFFEE STATING this to

Mr. Miles HE is Admitting that HE is Aware That His CASE load is imbalanced AND His docket is over Crowded with Inmates serving A Ridiculous Amount of Pre TRIAL INCARCERATION

TENN. Supreme Court Rules 11 (iii) (d) provides that
It shall be the duty of the Presiding
Judge to:

- (1) Reduce docket delays and hold congestion to a minimum;
- (2) Seek and maintain an equitable distribution of the workload and an equal sharing of the business of the district;
- (3) Promote the orderly and efficient administration of justice within the district
- (4) Take immediate and affirmative action to correct or alleviate any case load imbalance, or any condition adversely affecting the administration of justice within the district. et seq.

MR. Miles Alleges that Judge Coffe has been absent from court duties resulting in his Court Room Division 7 to be closed numerous of times in violation of Article 1 § 17 of the Tennessee Constitution that provides "[a]ll courts shall be open, and every man for an injury shall have remedy by due course of law and right and justice administered without sale, denial or delay."

AND THAT Judge COFFEE Took NONE OF THE
Appropriate steps provided IN THE Rules
██████████ Stated IN this ██████████ To MAKE SURE
Justice is NOT DELAYED OR DENIED
OR THAT this COURT Room WAS OPEN AND

AVAILABLE FOR THE TRANSACTION OF BUSINESS.
Mr. Miles Alleges THAT HE WAS prejudiced
By THESE Events AND suffered Anxiety, AND
Depression FROM these Actions. Mr. Miles
Alleges Judge COFFEE Violated T.C.A. 17-2-110,
17-2-201 et seq., T.C.A. 16-8-504(c), 16-3-502(3)(A)
AND T.C.A. 17-2-110, ARTICLE 18 17 OF THE
THE TENNESSEE CONSTITUTION, AND T.C.A. § 20-9-506,
RULE 11(VII) et seq. OF THE TENNESSEE Supreme
Court Rules

1. Mr. Miles Alleges THAT THESE ACTIONS FROM ADA. MEGHAN Fowler AND Judge Lee V. COFFEE CAUSED, Mr. Miles Intentional Infliction of Emotional Distress **(IIED)** SEE ROGERS V. LOUISVILLE LAND CO., 367 S.W.3d 196, 206 (TENN 2012)
 2. Caused Mr. Miles Anxiety & STRESS By Mr. Miles Being Incarcerated While His GRANDMOTHER (CORA Miles) AND GRAND FATHER (ELIJAH JONES) PASSED AND MR. Miles WAS NOT Allowed to Attend the funeral and memorial SERVICE DUE to False charges and Fraud AND Absentees of Judge.
 3. To Miss the birth of his daughter (who is now 2 years old) AND NOT Being Able to Support His 3 Children HE is ON Child support FOR AND could NOT make payments DUE to oppressive Pre trial Incarceration.
 4. Caused Mr. Miles UNCONSTITUTIONAL Pre trial Incarceration For over 2 years.
 5. Caused STRESS Between The Family of Mr. Miles AND caused curtailment of Them AND Friends
-

On the date of 9-26-2019, AT 201 Poplar Ave Shelby County Criminal Justice Center, ON the 7th Floor Cpod CELL 16 @ OR AROUND 12:00 to 12:45 PM,

I WAS PHYSICALLY ASSAULTED BY 4 OFFICERS OF THE Shelby County Criminal Justice Center.

THIS INCIDENT CAME ABOUT BY ME ASKING AN OFFICER BURNS (K6196) WAS HE THE C/O WHO HAD WRITTEN A PREVIOUS FALSE WRITE UP ON ME CAUSING ME TO RECEIVE 45 DEADLOCK DAYS IN ADMINISTRATION SEGREGATION. I ASKED HIM WAS HE THE C/O IN QUESTION BECAUSE I HAVE BEEN INCARCERATED HERE AT THE SCCJC FOR ALMOST 3 YEARS NOW SINCE THE DATE OF 3-31-2017, AND HAD NEVER SPOKE TO, MET, OR RECALL KNOWING A C/O BY THE NAME OF BURNS, AND THAT WAS THE NAME OF THE REPORTING OFFICER ON THE INCIDENT REPORT.

AROUND 12 TO 12:45 P.M. 8 OFFICERS INCLUDING SWAT SGT. CLEVES ENTERED 7th FLOOR Cpod TO ALLEGEDLY CONDUCT FEEDING FOR LUNCH, BUT BEFORE THE OFFICERS ENTERED THE POD I COULD HEAR THEM CONVERSING ABOUT BEING READY TO "WHOOPE SOME ASS." THE OFFICERS ENTERED THE POD, C/O BURNS (K6196) WAS BEHIND THE LUNCH CART WHICH HELD THE TRAYS, AND AS THEY ENTERED THE POD THEY WERE YELLING "GET UP MOTHERFUCKERS LUNCH TIME, TIME TO FEED THE ANIMALS."

My CELLMATE AT THE TIME (DEANGELO WARE-MITCHELL) INFORMED ME THAT THE OFFICER BEHIND THE CART WAS C/O BURNS. AT THAT TIME I RETRIEVED THE INCIDENT REPORT TO ASK HIM ABOUT IT AND ALSO RETRIEVED THE OLD STYROFOAM TRAYS FROM BREAKFAST TO DISCARD THEM AS IS REGULAR PROCEDURE.

I RETURNED TO THE DOOR WHERE MY CELLMATE WAS ALSO STANDING TO SEE C/O BURNS (16196) STANDING IN FRONT OF MY CELL WITH 2 TRAYS IN HIS HAND ONE OF WHICH WAS MARKED "1-C-16" DUE TO MY CELLMATE RECEIVING A SPECIAL DIET TRAY. I HEARD C/O BURNS INFORM MY CELLY TO GET BACK, BUT THE DOOR WAS SHUT SO WE DIDN'T UNDERSTAND WHAT HE WAS TALKING ABOUT. I THEN ASK HIM ABOUT THE INCIDENT REPORT AND WAS IT HIS NAME ON IT.

AT THIS TIME THE DOOR ROLLED AJAR (WHICH IS AGAINST THE SHELBY COUNTY JAIL STANDARD OPERATING PROCEDURE: 328.10 - Feeding Procedures ALSO 327.08(A)(1))

WHICH STATES "INMATES WILL BE SERVED TRAYS THROUGH THE SECURITY DRAWER FLAP ONLY."

I SET THE OLD BREAKFAST TRAYS TO THE SIDE AND TRIED TO PRESENT C/O BURNS (16196) WITH THE INCIDENT REPORT HE BECAME VERY IRRATE AND CONFRONTATIONAL, AND ANGRY STATING "NIGGA I DON'T KNOW YOU MOTHER FUCKER, I DIDN'T WRITE SHIT"

I THEN TRIED TO SHOW HIM THE NAME ON
 THE PAPER AND ASK HIM WHY WAS HE SO UPSET.
 HE THEN APPROACHED ME IN A VERY AGGRESSIVE
 MANNER AND PUT HIS FACE TO MINE. AND STATED
 "I TOLD YOUR BITCH ASS I DIDN'T RIGHT SHIT AND
 HEAD BUTTED ME IN THE FACE. AS I COVERED
 MY FACE HE THEN PUSHED ME BACK INTO THE CELL
 WHERE I FELL ON THE BOTTOM BUNK AND PRECEDED
 TO PUNCH ME IN THE FACE AND BODY. AT THIS TIME
 OTHER OFFICERS RUSHED THE CELL WHILE HE WAS ON
 TOP OF ME BEATING ME. I FELT A C/O GRAB MY
 LEGS AND PULL ME FROM THE BUNK TO THE FLOOR
 ON MY STOMACH. AN OFFICER ROGERS THEN
 STRATTLED MY BACK PUTTING ME IN A FOREARM
 CHOKER HOLD. WHILE TWO OFFICERS IN PRESUMING
 WHITE AND FREE HAND CUFFED MY HANDS TOGETHER
 FROM THE BACK. AT THIS TIME C/O BURNS (16196)
 PUT HANDCUFFS AROUND HIS HAND AND COMMENCED
 TO PUNCHING ME IN THE FACE, TEMPLE, AND THE BACK
 OF MY HEAD. (CORRECTION) I WAS NOT CUFFED YET
 BECAUSE I REMEMBER TRYING TO CRAWL OUT THE CELL
 TO GET IN THE DAY ROOM ON CAMERA. AS I CRAWLED
 I GRABED THE DOOR RAILING AND PULLED MYSELF
 TO THE OPENING OF THE DOOR AND AN OFFICER STARTED
 TO STOMP MY HANDS (WHICH PERMANENTLY DISFIGURED
 MY RIGHT HAND)

I Then Let go of The Door RELLING AND
 STARTED WAVING MY HANDS out of the
 Cell so to make sure The CAMERAS would
 see me. I over Heard A C/O SAYING don't let
 Him get on the CAMERA THATS WHEN I WAS
 Pulled Back IN By C/O's WHITE and FREE
 AND Then HAND cuffed From Behind. C/O
 ROGERS WAS still on my BACK choking me
 C/O BURNS (16196) WAS stomping me IN The
 BACK OF The Head, AND AT THIs TIME
 C/O's WHITE AND FREE Began to spread
 My legs AND Kick me in the pants AND
 SCRODUM NUMORUS of times. C/O ROGERS
 Then Pulled My Head Back while still in
 the choke Hold AND AN OFFICER SPRAYED
 Freeze Plus (MACE) UP My NOSTRILES, IN My EYES
 AND down my throat I Lost conscious AT
 thIs TIME But WAS AWAKEN By Another Blow/Stamp
 to The BACK OF My Head which Loosened 2 OF
 My Bottom Front Tee th. (which now HAS fallen out)
 I could Hear one officer SAY Thats Enough But
 I Also Heard C/O BURNS saying Ima Kill THIs
 Mother Fucker. They Then Stood me up AT thIs TIME
 I SAW the Shift Sgt. Cleves watching and smiling
 AT ME Then BURNS Punched me IN the FACE once
 MORE WITH HAND CUFFS AROUND HIS HAND

THEY THEN Pulled ME From the cell C/O Rogers
 WAS escorting me to the ELEVATOR to take me
 to Medical As we were heading down the HALLWAY
 to the ELEVATOR C/O BURNS WAS chasing me
 Trying to Continue to Attack me. Rogers was twisting
 my arm trying to break it. IN MEDICAL GIU Questioned me and I Informed
 them that I was AFRAID OF C/O Rogers so they could
 CALL THE GUARD assigned to me Then I Related
 THE INCIDENT to them. I WAS seen By the DR.
 At the SNL who Advised I HAD Lacerations in my
 Left EYE, AND I would need outside Medical Attention.
 I SET there For 45 minutes to AN Hour without
 Being Able to Flush the Chemicals From my Eyes
 From the MACE. After Almost Two Hours I WAS Transported
 The The Regional ONE MEDICAL CENTER'S TRAUMA
 UNIT, where I UNDERWENT CATSCANS AND OTHER
 VARIOUS OBSERVATIONS For injuries. I was Treated
 For the Pain AND WAS admitted there for 10 to 12
 Hours. I suffered CONTUSIONS to THE BACK OF the
 Head At Least 3 OF them, 2 Black EYES AND Lacerations
 to the Left EYE Also my Bone under my Left EYE
 Slightly Perturbed AND bones Leaving A Numb AND
 UN comfortable Feeling In My FACE, ABRASION, BRUISES, AND
 Swelling to Both side of my FACE AND THE BACK OF THE Head
 My Right PINKY is disfigured AS well AS my Right middle
 Finger. Two of my Front Bottom Teeth HAS Fallen out

And THE SIGHT IN MY Left Eye is BLURRY in which I have also been sent to the UT Eye Center Awaiting Eye SURGERY.

I contacted INTERNAL AFFAIRS which conducted AN Investigation OF THE MATTER, written grievances AND ALSO written the D.O.J. Civil Department. I was written up on this incident where the Jail Disciplinary Board Found me guilty of Assaulting staff where the D-Board officer Ms. SONES STATED on the Results OF THE Incident "SHE Reviewed the SURVILLANCE AND I was in the wrong." The SAME WOMAN WHO Found me guilty of the False write up By AN UNKNOWN C/O Burns I HAVE NEVER met. While conducting the Hearing Ms. Jones was Rolling her Eyes smacking her lips constantly trying to COHERS me into AN Argument with her SAY I don't HAVE Rights to Ask questions Just TAKE THE punishment AND move on. I was sentenced to 60 MORE days in Admin Seg. For this. I Then Appealed AND wrote VARIOUS Agencies AND OFFICERS, AND the verdict was over turned the Appeal Board STATING "The NARRATIVE OF The D-Boards Decisions DOES NOT MATCH the SURVILLANCE of the CAMERAS. So That would mean C/O Jones Lied AND Falsified the documents which is perjury intentionally to CAUSE HARM to ME

Mr. Miles Alleged The Actions of
C/O Burns, C/O FREE, C/O Rogers, C/O White,

1. Caused Him **(TIED)** And pain & suffering
By Body PAINS, Head **ACHES** Frequently, Disfigured
Right Hand, Partial Loss of sight in LEFT EYE,
TWO Bottom Front TEETH TO COME OUT. Loss of
weight due to BEING scared to EAT Because
The SAME OFFICERS BRING Him His **TRAYS**.
2. Mr. Miles need dental work due to this
incident, Surgery on His Left EYE,
Sgt. CLUMENS
3. Mental STRESS due to BEING Locked in The
Cell 23 hours AND 45 minutes A DAY;
AND Not Getting the Allotted Recreation time
At All For 45 days From 9-24-2019 to 11-7-2019

C/O Jones

UNJustified Hole time By Falsely Agreeing
with UN TRUE STATEMENTS AND PERJURY.

Mr. Mrs SEEKS MONETARY Judgement For
compensatory and special damages from all
The Defendants AND in form of holding each
of the Defendants Jointly AND severally
Liable for all of the damages awarded in this
Civil Action, For the Tort of Civil Conspiracy
with the Amount of such damages ~~to be~~
to be determined at the trial of this
Action but NOT LESS THAN \$300,000.00,
AND punitive damages of \$500,000.00

As an Actual AND proximate Result of the
Defendants Having committed the legally-actionable
Tort of civil conspiracy (to commit AND in committing
the underlying torts ~~set~~ forth herein above)
Against the Plaintiff, Plaintiff suffered
Emotional AND bodily PHYSICAL-Personal Injuries,
Harms AND damages.

WHEREFORE AND For all of which, Plaintiff claims
AND SEEKS Relief in the form of a Monetary
Judgment For compensatory damages from all
The Defendants For the Tort of Intentional
Infliction of Emotional Distress with the Amount
of such damages to be determined at the Trial
of this Action but NOT less than 300,000.00 AND punitive damages
of \$500,000.00

Case 3:19-cr-00774-JDT-cgc Document 1 Filed 11/08/19 Page 24 of 24 PageID 24
DEANGELO WARE MITCHELL + Don't Know Booking #
JUVONTA CARPENTER (16107001)
Joshua Holloway (19113547)

My WITNESSES

All At Shelby County Criminal Justice Center